

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION**

UNITED STATES OF AMERICA

VS.

ISRAEL JOSE JUAREZ

§
§
§
§
§
§

CASE NO. 2:21-cr-00797

OPPOSED MOTION TO MODIFY BOND CONDITIONS

The defendant, Israel Jose Juarez, by and through his undersigned counsel, hereby files his Opposed Motion to Modify Bond Conditions and shows unto this Honorable Court the following:

I.

On August 26, 2021 Defendant Israel Jose Juarez was released from custody on a seventy five thousand dollar (\$75,000.00) two (2) percent bond. As a condition of his bond, defendant was required to abide by the following restrictions on travel:

Travel Restricted to the McAllen and Brownsville Divisions with permissions to travel to Corpus Christi, Texas for court appearances, attorney conferences and other court related matters. Travel outside the restricted area to be pre-approved by USPO. No travel to Mexico without court approval. Defendant may travel for work but must drive locally and be home at night.

II.

Defendant requests that the court grant him permission to travel outside the limited Counties listed on the bond condition release. Mr. Juarez is a commercial truck driver and relies on traveling outside of the State as part of his occupation. Granting him permission to travel outside Hidalgo, Cameron, and Nueces counties and to other States will be strictly for work purposes.

III.

Counsel for the Government opposes this Motion. Defendant's pre-trial services officer has indicated that she does not oppose this motion.

WHEREFORE, based upon the foregoing facts and circumstances, the defendant, Israel Jose Juarez, with the consent and agreement of the United States Department of Justice, respectfully request that his travel related bond condition be modified in accordance with the matters stated herein.

Respectfully Submitted,

/s/ Eddie Lucio

Eddie Lucio

State Bar No. 00791145

834 E Tyler St.

Brownsville, Texas 78520

(956) 546-9400

(956) 750-8807 Facsimile

Email: elucio@luciolaw.com

CERTIFICATE OF SERVICE

This is to certify that on September 24, 2021 a true and correct copy of the foregoing was delivered to the involved parties, by the CM/ECF system.

/s/ Eddie Lucio

Eddie Lucio

CERTIFICATE OF CONFERENCE

I, Eddie Lucio, certify that on the 8th day of September 2021 have conferred with the United States Attorney's James Parker Gochenour, with regards to the merits and the filing of this motion, and he is opposed.

/s/ Eddie Lucio

Eddie Lucio